



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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May 29, 2002

Robert Werlin
Keegan, Werlin and Pabian, LLP
21 Custom House Street
Boston, MA 02110

Re: KeySpan Energy Delivery D.T.E. 02-32

Dear Mr. Werlin:

Enclosed please find the Department of Telecommunications and Energy's First Set of Information Requests to KeySpan Energy Delivery New England ("the Company") issued in the above-captioned matter. Please submit the Company's responses on or before 5 P.M., Wednesday, June 5, 2002.

Thank you for your attention in this matter.

Sincerely,

Elizabeth A. Cellucci
Hearing Officer

Enc.

cc: Mary Cottrell, Secretary
Joseph Rogers, Office of the Attorney General

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO KEYSpan ENERGY DELIVERY NEW ENGLAND
D.T.E. 02-32

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to KeySpan Energy Delivery New England ("KeySpan" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) Elizabeth Cellucci, Hearing Officer; (2) Kevin Brannelly, Rates and Revenues Division; (2) Sean Hanley, Rates and Revenues Division; (3) George Yiankos, Gas Division; (4) Claude Francisco, Rates and Revenues Division; (5), Ken Dell Orto, Gas Division; and (6) Becky Hanson, Legal Division.
8. Responses are due by 5:00 p.m., Wednesday, June 5, 2002.

- DTE 1-01 Please state and explain the reasons why a specific date (July 1, 2002) was chosen as the day when the existing customer-information system will be converted to the Customer Related Information System ("CRIS"). What are the consequences of delaying the implementation date of the CRIS?
- DTE-1-02 In reference to the "Explanatory Statement" at 1, please indicate if KeySpan, N.E. has performed any studies that quantify the "significant short- and long-term benefits for customers" of Boston Gas Company, Colonial Gas Company, and Essex Gas Company (collectively referred to as "the Companies"). If yes, please provide those studies.
- DTE-1-03 In reference to the "Explanatory Statement" at 3, please indicate the docket number(s) and a copy of any orders approving the CRIS system in New York. Provide a copy of the filing proposing the CRIS system in New York.
- DTE-1-04 In reference to the "Explanatory Statement" at 3, please indicate the docket number(s) and a copy of any orders approving the CRIS system in New Hampshire. Provide a copy of the filing proposing the CRIS system
- DTE-1-05 In reference to the "Explanatory Statement" at 5, please provide all documents, including all filings by the Companies with the Department, that serve as a basis for the statement: "[c]urrently tariffed rates are based on the assumed, monthly 30-day billing cycle (with 12 cycles occurring over the course of a year)."
- DTE-1-06 For each of the three Sample Bill Formats, please indicate whether the charges shown are based on the Companies' proposed charges under the CRIS. If yes, please indicate for each Sample Bill Format the name of the gas utility and describe with supporting schedules how each component charge, including the Minimum Charge, block breaks, and headblock and tailblock charges, were derived. Will the name of the local distribution company appear on the bill?
- DTE-1-07 For each of the Companies, please provide a schedule that shows by rate class:
a) the normalized billing determinants used in designing the existing rates;
b) the proposed normalized billing determinants used in designing the proposed rates; and
c) the difference between a) and b).
- DTE-1-08 Please explain in detail the Companies' reasons for designing the proposed rates

using 2001 normalized billing determinants instead of the billing determinants used to develop the existing rates.

- DTE-1-09 For each of the Companies, please provide for each rate class the bill frequency schedule used during each Company's last general rate case proceeding. Why does switching from the Customer Service System ("CSS") to CRIS change the customer counts for the number of days per cycle?
- DTE-1-10 In reference to Attachment 4 for each of the Companies, please describe with supporting schedules how the CSS and CRIS customer counts were determined for each of the 26- through 34-day cycles.
- DTE-1-11 Please provide analysis showing the bill impacts for each rate class of each of the Companies for customers at 5, 10, 25, 50, 75, 90, and 95 percent of bills. Perform the analysis for customers with 26-, 28-, 30-, 32-, and 34-day actual cycles. Please provide also in an electronic-readable medium a copy of the response (Microsoft Excel Windows 2000).
- DTE-1-12 In reference to Attachments 1 and 3 for each of the Companies, please describe with supporting documentation and schedules how the CSS 2001 normalized determinants and revenues were determined. Please provide a copy of the 2002 meter-read schedule.
- DTE-1-13 In reference to Attachment 6 for each of the Companies, please indicate whether the meter reading schedule for 2001 will be maintained for 2002. If not, please describe the reasons for any changes in the schedule.
- DTE-1-14 In reference to Attachment 6 for each of the Companies, please describe any billing-day adjustment performed prior to designing the proposed rates.
- DTE-1-15 Currently, when there is a change in a customer's rates that does not coincide with the start of a billing period, then the usage billed at the old rate and new rate is prorated taking into consideration the heating factor. Please explain the impact the CRIS will have on each Company's current method of prorating a change in rates.
- DTE-1-16 To what extent is KeySpan's billing method used in New York City, also used in the remainder of the state of New York? Provide a list of all the local distribution companies in New York and state for each distribution company whether it uses Keyspan's New York City billing method.
- DTE-1-17 Please describe KeySpan's billing method used in New York City prior to the implementation of its current method. Why was a change in the billing method made? What was the response from KeySpan's customers?

DTE-1-18 Please explain how the calculation and billing of the Residential Conservation Service (RCS) charge would be affected by the use of KeySpan's proposed billing method in Massachusetts.